

COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
South Central Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Thomasville Furniture Industries, Inc., Virginia Operations
Appomattox, Virginia
Permit No. (SCRO-30616)

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Thomasville Furniture Industries, Inc., Virginia Operations has applied for a Title V Operating Permit for its Appomattox facility. The Department has reviewed the application and has prepared a Title V Operating Permit.

Engineer/Permit Contact: _____

Date:

Air Permit Manager: _____

Date:

Regional Director: _____

Date:

FACILITY INFORMATION

Permittee

Thomasville Furniture Industries, Inc., Virginia Operations
P.O. Box 848
Appomattox, VA 24522

Facility

Thomasville Furniture Industries, Inc., Virginia Operations
Route 460 Business
Appomattox, VA 24522

County-Plant Identification Number: 51-011-00010

SOURCE DESCRIPTION

NAICS Code: 337122 – Thomasville Furniture Industries, Inc., Virginia Operations manufactures wood furniture and wood furniture parts covered by Standard Industrial Classification (SIC) Code 2511. The facility was originally constructed in 1974 and consists of two boilers and miscellaneous woodworking and finishing equipment.

The facility is a Title V major source of PM-10, SO₂, VOC, and HAPs. This source is located in an attainment area for all pollutants, and is a PSD major size source. The facility operates under NSR Permits dated May 10, 1974, March 10, 2000, and June 3, 2003.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility was issued a Warning Letter on October 25, 2004 alleging noncompliance; however, the facility has returned to operating in compliance.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following :

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Fuel Burning Equipment							
ESBL1	EPBL1	Keeler Boiler DS-8-2 (1974)	12.96 MMBtu/hr	None	N/a	N/a	5/10/74
ESBL2	EPMC 2B	Keeler Boiler "MBK"(1974)	68.53 MMBtu/hr	Joy Manufacturing Western Precip. Group Multicyclone	CDMC2A CDMC2B	PM, PM-10	5/10/74
Woodworking Equipment Subject to 9 VAC 5 Chapter 50 (New or Modified)							
WW1-5	EPBF1-5	Misc. woodworking (Nos. 1-5 Dust Collector Systems)	Varies	Fabric filter	CDBF1-5	PM, PM-10	5/10/74
WW6	EPBF6	Misc. woodworking (No. 6 Dust Collector System)	Varies	Fabric filter	CDBF6	PM, PM-10	N/a
WW7	EPBF7	Misc. woodworking (No. 7 Dust Collector System)	Varies	Fabric filter	CDBF7	PM, PM-10	3/10/00
WW8	EPBF8	Wood hog transfer sys. (No. 8 Dust Collector System)	Varies	Cyclone and fabric filter	CDCY8 CDBF8	PM, PM-10	N/a

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Furniture Finishing Equipment Subject to 9 VAC 5 Chapter 50 (New or Modified)							
ESFN1	EPRC1, EPDO2, EPRC3, EPRC4, EPDT5, EPDO6, FRC7 (fugitive), EPRC8, EPDO9, EPRC10, EPRC11, EPRC12	Fill/Print Line (1974)	Varies	None	N/a	N/a	5/10/74
ESFN2	EPSB14, 14B, 15A, 15B, 17A, 17B, 19A, 19B, 19C, 20A, 20B, 21, 22, 23A, 23B, 25, 27, 28, 29, EPDO16, 18A, 18B, 18C, 24, 26A, 26B, 30, FDT31	Finishing Spray area (1974)	Varies	None	N/a	N/a	5/10/74

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Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
ESFN3	EPL32	Laminator Line	Varies	None	N/a	N/a	6/3/03
ESFN4	N/a	Gluing Operations Plantwide	Varies	None	N/a	N/a	5/10/74

EMISSIONS INVENTORY

Reported actual 2004 annual emissions are summarized in the following tables.

2004 Actual Emissions

	2004 Criteria Pollutant Emission in Tons/Year				
Emission Unit	VOC	CO	SO ₂	PM ₁₀	NO _x
Total Facility	60.05	41.34	1.72	24.09	33.76

2004 Actual Hazardous Air Pollutant Emissions

Pollutant	2004 Hazardous Air Pollutant Emission in Tons/Yr
Formaldehyde	0.92
Toluene	4.30
Glycol Ether	0.92

EMISSION UNIT APPLICABLE REQUIREMENTS – Keeler Boilers (Emission Unit ID# ESBL1 & ESBL2)

Limitations

Fuel burning emissions are expected from the operation of the Keeler Boilers (ESBL1 & ESBL2). The 68.53 MMBtu/hr Keeler boiler (ESBL2) is limited to burning either wood or #2 distillate oil. The 12.96 MMBtu/hr Keeler boiler (ESBL1) is limited to burning #2 distillate oil. Particulate matter emissions from Keeler boiler (ESBL2) are required to be controlled by two multicyclones in series (CDMC2A, 2B).

The boilers are each subject to 40 CFR 63 Subpart DDDDD (MACT Subpart DDDDD), the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters and 40 CFR Part 63 Subpart A as outlined in the permit. Emission limits and work practice standards are provided in Table 1 of the MACT. Boiler ESBL2 will have to meet requirements for existing large solid fuel boilers. There are no emission limits or work practice standards listed in Table 1 for existing large liquid fuel boilers like ESBL1. Each boiler must comply with applicable General Requirements in 40 CFR 63.705. The compliance date for this MACT is September 13, 2007.

The opacity limits for both boilers are 20 percent except during one six minute period in any one hour when the opacity can be 30 percent.

The 68.53 MMBtu/hr Keeler boiler (ESBL2) has the following emission limits:

Particulate Matter (PM) 0.35 lbs/MMBtu

Sulfur Dioxide	180.9 lbs/hr
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The 12.96 Keeler boiler (ESBL1) has the following emission limits:

Particulate Matter (PM)	0.35 lbs/MMBtu
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Sulfur Dioxide	34.2 lbs/hr
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Emission limits for Particulate Matter (PM) and SO₂ for the boilers are based on maximum design throughput for the equipment. Compliance with these limits in the permit can be demonstrated through calculations.

ESBL1 is limited to burning no. 2 fuel oil and would not have the potential to exceed either the PM or SO₂ permit limit. The allowable SO₂ emission limits for this boiler is based on a fuel sulfur content of 2.5%. Since this boiler is limited to burning #2 fuel oil only, further demonstration of compliance with this limit is not warranted since by ASTM definition #2 fuel oil cannot contain more than 0.5% sulfur. The permittee will maintain records of the sulfur content of fuel oil burned in the boiler. The calculations demonstrate that this boiler does not exceed the allowable emission limitation and no further periodic monitoring should be required. The permittee will keep annual records of the fuel combusted in ESBL1.

ESBL2 could potentially emit 32.23 lb/hr of PM with no controls. The allowable emission rate in the permit equates to 23.99 lb/hr, based on 0.35 lb/MMBtu for this boiler. A condition stating that PM emissions from the boilers will be controlled by a multicyclone is included in the permit. Since the permittee is unable to keep records of the scrap wood fuel combusted in this boiler on a monthly basis, and the AP-42 guideline for multicyclone efficiency is only 50%, a stack test for PM will be required once per permit period, not to exceed 5 years between tests. This boiler can no longer burn coal. The major modifications required for this boiler to burn either coal or heavy fuel oil would require a permit modification and the issue of more stringent record keeping to demonstrate compliance with SO₂ emission limitations would be addressed at that time.

Monitoring

The permittee is required to observe each of the Keeler boiler (ESBL1 & ESBL2) stacks on a weekly basis. The presence of visible emissions requires the permittee to take timely corrective action such that the boilers resumes operation with no visible emissions or the permittee must conduct a visible emission evaluation (VEE) to assure the visible emissions are less than the opacity limit.

The 68.53 MMBtu/hr Keeler boiler (ESBL2) is subject to the requirements in 40 CFR 64 – Compliance Assurance Monitoring. The facility submitted a CAM Plan dated 5/20/2005 along with their Title V renewal application. The facility proposed and is required to use a differential pressure measuring device on each multicyclone to monitor performance and to assure compliance with the limit on Particulate Matter in conjunction with visible emission observations. Each differential pressure monitoring device is required to be monitored at least once per day.

Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

- a. Visible emissions log for the Keeler boiler stacks (ESBL 1, 2),
- b. The annual combustion of No. 2 fuel oil, in gallons in the Keeler boilers (ESBL1, 2),
- c. The sulfur content for each shipment of No. 2 fuel oil to be burned in the #1 Keeler boiler (ESBL1),
- d. The annual combustion of scrap wood, in tons, in the #2 Keeler boiler (ESBL2),
- e. The results of all stack tests,
- f. The origin and value of all emission factors for all pollutants.

Additional recordkeeping requirements are in 40 CFR 63.7555.

Testing

At a frequency not to exceed five years, the permittee is required to conduct a stack test for PM from the #2 Keeler boiler (ESBL2) while burning wood to demonstrate compliance with the emission limit contained in Condition III.A.4 of the permit. The test will be sufficient to document a correlation between multicyclone performance and PM emissions as required by the 5/20/05 CAM Plan and 40 CFR 64.

MACT Subpart DDDDD requires initial compliance demonstrations in 40 CFR 63.7510 and subsequent performance tests or fuel analyses in 40 CFR 63.7515.

Reporting

The permittee shall submit written reports in accordance with the General Conditions of this permit and as required by 40 CFR 63.7545 and 40 CFR 63.7550.

EMISSION UNIT APPLICABLE REQUIREMENTS – No. 7 Dust Collection System (Emission Unit ID# WW7)

Limitations

The requirements for the No.7 Dust Collection System are outlined in the 3/10/00 NSR permit. Particulate matter emissions are expected from the No. 7 Dust Collector System and these emissions are required to be controlled by a fabric filter (CDBF7). Additionally, all subsequent transfer of the collected material from the No. 7 Dust Collector System must be controlled by a fabric filter and/or a completely enclosed transfer system. Fugitive particulate emissions from the collection and transferring of collected wood waste must be controlled by complete enclosure.

Visible emissions from the No. 7 fabric filter exhaust may not exceed five (5) percent opacity and visible emissions from any fugitive emission points associated with the No. 7 Dust Collector System may not exceed 10 percent opacity.

The No. 7 Dust Collector System (WW7) may not operate more than 7,800 hours per year and the system is subject to the following emission limits:

Particulate Matter (PM) 0.01 gr/dscf

PM-10 0.01 gr/dscf

Monitoring

The permittee is required to observe emissions associated with the No. 7 Dust Collector System on a weekly basis. The presence of visible emissions requires the permittee to take timely corrective action such that the dust collector system resumes operation with no visible emissions or the permittee must conduct a visible emission evaluation (VEE) to assure the visible emissions are less than the opacity limit. If there are no visible emissions for 12 consecutive weeks, the frequency of the visible emissions observations may be reduced to once per month.

The fabric filter (CDBF7) is also required to have a device to continuously measure the differential pressure drop across the fabric filter.

The No. 7 Dust Collector System is not subject to CAM since potential pre-control device emissions are calculated to be less than 100 tpy of PM-10. The potential pre-control device PM-10 emissions are estimated to be less than 40 tpy total for all eight dust collector system fabric filters.

Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

- a. The yearly hours of operation of the No. 7 Dust Collector System, recorded as the sum of each consecutive 12 month period,
- b. Visible emissions logs for the emission points associated with the No. 7 Dust Collector System,
- c. The origin and value of all emission factors for all pollutants.
- d. Results of stack tests.

Testing

The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The permittee shall submit written reports in accordance with the General Conditions of this permit.

EMISSION UNIT APPLICABLE REQUIREMENTS – Nos. 1-6 and 8 Dust Collection Systems (Emission Unit ID# WW1-WW6 and WW8)

Limitations

Particulate matter emissions are expected from the Dust Collection Systems. Each Dust Collection System (WW1-WW6 and WW8) is required to be controlled by a fabric filter (CDBF1 - CDBF6 and CDBF8). The Nos. 1-6 and 8 Dust Collection Systems are required to emit less than 0.05 grains of particulate matter per standard cubic foot of exhaust gas. Visible emissions, including fugitive emissions, from the Dust Collection Systems (WW1-WW6 and WW8) must not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity, as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).

Monitoring

The permittee is required to observe emissions associated with Nos. 1-6 and 8 Dust Collector Systems on a weekly basis. The presence of visible emissions requires the permittee to take timely corrective action such that the affected dust collector system(s) resumes operation with no visible emissions or the permittee must conduct a visible emission evaluation (VEE) to assure the visible emissions are less than the opacity limit. If there are no visible emissions for 12 consecutive weeks, the frequency of the visible emissions observations may be reduced to once per month.

The Dust Collection Systems (WW1-WW6 and WW8) are not subject to CAM since potential pre-control device emissions are calculated to be less than 100 tpy of PM-10. The potential pre-control device PM-10 emissions are estimated to be less than 40 tpy total for all eight dust collector system fabric filters.

Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

- a. Visible emissions logs for the emission points associated with the Nos. 1-6 and 8 Dust Collector Systems,
- b. The origin and value of all emission factors for all pollutants.
- c. Results of all stack tests.

Testing

The permittee shall conduct a one time test for PM-10 at the inlet and outlet of the dust collection system fabric filter (CDBF4) for Dust Collector System (WW4). An alternate fabric filter may be tested if approved by DEQ. The results will be used to demonstrate that potential pre-control device PM-10 emissions from the dust collection system fabric filters (CDBF1-CDBF8) are less than 100 tpy each, and therefore the fabric filters are not subject to CAM (40 CFR 64). The test shall be performed using EPA Method 201 for both inlet and outlet or another method as approved by DEQ. The test shall be performed within 180 days after the effective date of this permit.

The Department and EPA have authority to require additional testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The permittee shall submit written reports in accordance with the General Conditions of this permit.

EMISSION UNIT APPLICABLE REQUIREMENTS – Fill/Print Line and Finishing Spray Area (Emission unit ID# ESN1-2)

Limitations

The Fill/Print Line and Finishing Spray Area (Emission unit ID# ESN1 & 2) are subject to 40 CFR 63 Subpart JJ (MACT Subpart JJ), the National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations and 40 CFR Part 63 Subpart A. Emission limits for furniture finishing operations are in 40 CFR 63.802 and work practice standards are in 40 CFR 63.803. The compliance date for this MACT was November 21, 1997 for this facility.

Visible emissions from the Fill/Print Line and Finishing Spray Area (ESN1 & 2) must not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity, as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).

Monitoring

The permittee is required to observe emissions associated with the Fill/Print Line and Finishing Spray Area (ESN1 & 2) on a weekly basis. The presence of visible emissions requires the permittee to take timely corrective action such that the affected dust collector system(s) resumes operation with no visible emissions or the permittee must conduct a visible emission evaluation

(VEE) to assure the visible emissions are less than the opacity limit. If there are no visible emissions for 12 consecutive weeks, the frequency of the visible emissions observations may be reduced to once per month.

CAM does not apply to the Fill/Print Line and Finishing Spray Area (Emission unit ID# ESN1 & 2) since there are no associated control devices.

Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

- a. Visible emissions log for the emission points associated with the Fill/Print Line and Finishing Spray Area (ESFN1 & 2),
- b. The origin and value of all emission factors for all pollutants,
- c. Records required by MACT Subpart JJ in 40 CFR 60.806.

Testing

Compliance procedures and monitoring requirements are in 40 CFR 63.804.

Reporting

The permittee shall submit written reports in accordance with the General Conditions of this permit and 40 CFR 63.807.

EMISSION UNIT APPLICABLE REQUIREMENTS – Laminating Line (Emission unit ID# ESN3)

Limitations

Particulate matter, VOC, and HAP emissions are expected from the operation of the laminating line. Particulate matter emissions from the double sided brush cleaner portion of the laminating line must be controlled by a fabric filter. The throughput of urea formaldehyde resin through the resin application machine is limited to 205,000 gallons per year to limit VOC and HAP emissions.

Emissions from the operation of the board laminating line must not exceed the following emission limits:

Volatile Organic Compounds	4.74 lbs/hr	7.2 tons/yr
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Visible emissions from the board laminating line must not exceed 5 percent opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A).

The laminating line (Emission unit ID# ESN3) is subject to 40 CFR 63 Subpart JJ (MACT Subpart JJ), the National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations and 40 CFR Part 63 Subpart A. Emission standards for the laminating line are in 40 CFR 63.802 and work practice standards are in 40 CFR 63.803. Compliance with MACT Subpart JJ was required upon startup.

Monitoring

The permittee is required to observe emissions from the Laminating Line (ESFN3) on a weekly basis. The presence of visible emissions requires the permittee to take timely corrective action such that the Laminating Line resumes operation with no visible emissions or the permittee must conduct a visible emission evaluation (VEE) to assure the visible emissions are less than the opacity limit. If there are no visible emissions for 12 consecutive weeks, the frequency of the visible emissions observations may be reduced to once per month.

CAM does not apply to the laminating line (Emission unit ID# ESN3) since there are no associated control devices.

Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

- a. Annual throughput of urea formaldehyde resin in units of gallons, calculated monthly as the sum of each consecutive 12 month period.
- b. Material Safety Data Sheets (MSDS) or other vendor information showing VOC content and solids content for each raw material used.
- c. Monthly emissions calculations for VOC using calculation methods based on mass balance approved by the South Central Regional Office to verify compliance with the annual emissions limitations in Condition 6.
- d. Records required by MACT Subpart JJ in 40 CFR 63.806.
- e. Copies of reports required by MACT Subpart JJ in 40 CFR 63.807.
- f. Copies of notifications required by Condition 11 of 6/3/2003 NSR permit.
- g. Scheduled and unscheduled maintenance, and operator training.
- h. Results of the weekly opacity observations for emission points associated with the laminating line.
- i. The origin and value of all emission factors for all pollutants.
- j. Records required by MACT Subpart JJ in 40 CFR 60.806.

Testing

Compliance procedures and monitoring requirements are in 40 CFR 63.804.

Reporting

The permittee shall submit written reports in accordance with the General Conditions of this permit and 40 CFR 63.807.

EMISSION UNIT APPLICABLE REQUIREMENTS – Gluing Operations (Emission unit ID# ESN4)

Limitations

The gluing operations (Emission unit ID# ESN4) are subject to 40 CFR 63 Subpart JJ (MACT Subpart JJ), the National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations and 40 CFR Part 63 Subpart A. Emission limits for furniture finishing operations are in 40 CFR 63.802 and work practice standards are in 40 CFR 63.803. The compliance date for this MACT was November 21, 1997 for this facility.

Monitoring

CAM does not apply to the gluing operations (Emission unit ID# ESN4) since there are no associated control devices.

Recordkeeping

The permit includes requirements for maintaining records. These records shall include but are not limited to the following:

- a. The annual usage of glues, calculated monthly as the sum of each consecutive 12-month
- b. Material Safety Data Sheets for each glue
- c. The origin and value of all emission factors for all pollutants.
- d. Records required by MACT Subpart JJ in 40 CFR 60.806

Testing

Compliance procedures and monitoring requirements are in 40 CFR 63.804.

Reporting

The permittee shall submit written reports in accordance with the General Conditions of this permit and 40 CFR 63.807.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

B. Permit Expiration

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.1-20.01:2 and §10.1-1185 of the *Code of Virginia*, and the "Department of Environmental Quality Agency Policy Statement NO. 3-2001".

F. Failure/Malfunction Reporting

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

J. Permit Modification

This general condition cites the sections that follow:

9 VAC 5-80-50. Applicability, Federal Operating Permit For Stationary Sources

9 VAC 5-80-190. Changes to Permits.

9 VAC 5-80-260. Enforcement.

9 VAC 5-80-1100. Applicability, Permits For New and Modified Stationary Sources

9 VAC 5-80-1790. Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas

9 VAC 5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

U. Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general condition F.

Y. Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

INAPPLICABLE REQUIREMENTS

The following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
40 CFR 60 Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	Applies to boilers constructed, reconstructed or modified after June 9, 1989

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
ESST1, 3	Diesel fuel storage tank	9 VAC 5-80-720 B	VOC	
ESST2	No. 2 fuel oil tank	9 VAC 5-80-720 B	VOC	
ESST4	Boiler chemical storage tank	9 VAC 5-80-720 B	VOC	
ESST5, 6	Propane storage tank	9 VAC 5-80-720 B	VOC	
ESST7	Gasoline storage tank	9 VAC 5-80-720 B	VOC	
ESST8, 9	Finishing material storage tank	9 VAC 5-80-720 B	VOC	
ESST10, 11, 12	Finishing material storage tank	9 VAC 5-80-720 B	VOC	
ESST13, 14, 15	Finishing material storage tank	9 VAC 5-80-720 B	VOC	
PWO	Degreasing/parts washing	9 VAC 5-80-720 B	VOC	
OWSO	Water evaporator / oil separator	9 VAC 5-80-720 B	VOC	
TWDS	Wood dust	9 VAC 5-80-720 B	PM	

	storage pile			
ESCE1	Diesel fire pump engine	9 VAC 5-80-720 C		270 HP
ESCE2	LP gas emergency generator	9 VAC 5-80-720 C		40 HP

¹The citation criteria for insignificant activities are as follows:

9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application

9 VAC 5-80-720 B - Insignificant due to emission levels

9 VAC 5-80-720 C - Insignificant due to size or production rate

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The proposed permit was advertised for public notice in the Lynchburg News & Advance on October 14, 2005 and comments were received for 30 days.

COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
South Central Regional Office

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Engineer/Permit Contact: _____ Date: _____

Air Permit Manager: _____ Date: _____

Regional Director: _____ Date: _____

FACILITY INFORMATION

Permittee

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P.O. Box 848
Appomattox, VA 24522

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Route 460 Business
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County-Plant Identification Number: 51-011-00010

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COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units, pollution control devices, and stacks are those units as described in the table in Section II of this Title V permit.

EMISSIONS INVENTORY

A copy of the 2006 annual emission update is attached.

EMISSION UNIT APPLICABLE REQUIREMENTS -

In their decision dated 6/8/07 the District of Columbia Circuit Court of Appeals vacated 40 CFR Subpart DDDDD (the boiler MACT). Specific guidance on how to permanently address this situation is currently being considered, and will be applied when available. Prior to vacatur, the Keeler Boiler #1 (ESBL1) and Keeler Boiler #2 (ESBL2) were subject to the boiler MACT. In their letter dated October 9, 2007 Thomasville requested that, since the boiler MACT has been vacated, the provisions in the Title V permit dated November 28, 2005 based on the boiler MACT be removed. On November 15, 2007, SCRO received Thomasville's permit application dated November 14, 2007 for an administrative amendment to remove these conditions. This request is in accordance with current interim policy and so the boiler MACT provisions for these boilers have been removed as requested.

GENERAL CONDITIONS

No changes from the November 28, 2005 Title V permit.

STATE ONLY APPLICABLE REQUIREMENTS

None. No changes from the November 28, 2005 Title V permit.

FUTURE APPLICABLE REQUIREMENTS

No changes from the November 28, 2005 Title V permit.

INAPPLICABLE REQUIREMENTS

No changes from the November 28, 2005 Title V permit.

COMPLIANCE PLAN

None. No change from the November 28, 2005 Title V permit.

INSIGNIFICANT EMISSION UNITS

No changes from the November 28, 2005 Title V permit.

CONFIDENTIAL INFORMATION

None. No change from the November 28, 2005 Title V permit.

PUBLIC PARTICIPATION

None. In accordance with 9 VAC 5-80-200 no public participation is required for administrative amendments to Title V permits.